Amendments to the Claims:

1. (Original) A computer system for a pay for performance advertising system, the computer system comprising:

an account database maintained in computer readable media, the account database comprising a plurality of advertising accounts having funds associated therewith;

an advertiser database maintained in computer readable media, the advertiser database having an advertising unit identifier associated with an advertising unit displayable on a website and said advertising unit identifier further associated with one or more participating advertisers and bid denominations associated with the participating advertisers;

a query processing section operatively coupled to the advertiser database and programmed to: retrieve, responsive to an advertising unit selection entered on a query client computer, a next advertiser in a rotation of participating advertisers associated with said advertising unit, based on the bid denominations of the participating advertisers;

route the query client to an advertising content page associated with the next advertiser in the rotation of participating advertisers retrieved by the query processing section.

- 2. (Original) The computer system recited in claim 1, wherein the query processing section is further programmed to determine the next advertiser in said rotation of participating advertisers based on historical rotation data of participating advertisers and the bid denomination of the participating advertisers.
- 3. (Original) The computer system recited in claim 1, wherein the query processing section is further programmed to determine the next advertiser to reduce a disparity between historical rotation data of the participating advertisers and the bid denomination of the participating advertisers.
- 4. (Original) The computer system recited in claim 2, wherein the query processing section is further programmed to determine historical rotation data comprising actual participation data of each of the participating advertisers.
- 5. (Original) The computer system recited in claim 2, wherein the query processing section is further programmed to determine actual participation data based on a count of the number of times that each participating advertiser is retrieved by the query processing section.

- 6. (Original) The computer system recited in claim 2, wherein the query processing section is further programmed to determine target participation data for each of the participating advertisers based on the respective bid denominations.
- 7. (Original) The computer system recited in claim 6, wherein the query processing section is further programmed to determine the next advertiser in said rotation of participating advertisers by reducing the disparity between the actual participation data and the target participation data of each of the participating advertisers.

(A/N/A HON WATTECHTOLOGIT STOCKONN & VTYECHTOLOGI, INC., AND FOXCONN EV SYSTEM LLC TO DISMISS, OR, IN THE ALTERNATIVE, CONVERT THE BANKRUPTCY CASES

PLEASE TAKE NOTICE that on July 20, 2023, Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC (collectively, the "Movants" or "Foxconn") filed the Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases (D.I. 131) (the "Motion"). A copy of the Motion can be accessed free of charge at the Debtors' claims agent's website through the following link:

https://www.kccllc.net/lordstown/document/231083123072000000000009.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will take place on <u>August 28, 2023, at 10:30 a.m. (prevailing Eastern Time)</u> before the Honorable Mary F. Walrath, United States Bankruptcy Judge (the "Hearing").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing; (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, on or before <u>August 21, 2023, at 4:00 p.m. (prevailing Eastern Time)</u> (the "Objection Deadline"); and (c) be served so as to be received on the following by the Objection Deadline: (i) Morris, Nichols, Arsht, & Tunnell LLP, 1201 North Market Street, 16th Floor, P.O. Box 1347, Wilmington, DE 19899-1347 (Attn: Robert J. Dehney (rdehney@morrisnichols.com) and Matthew B. Harvey (mharvey@morrisnichols.com); and (ii) Paul Hastings LLP, 71 South Wacker Drive, Suite 4500, Chicago, IL 60606 (Attn: Matthew M. Murphy (mattmurphy@paulhastings.com), Matthew Micheli (mattmicheli@paulhastings.com), and Michael C. Whalen (michaelwhalen@paulhastings.com).

- 13. (Original) The computer system recited in claim 11, wherein the query processing section is further programmed to display said listing in an order corresponding to the bid denominations associated with the participating advertisers.
- 14. (Original) A computer system for a pay for performance advertising system, the computer system comprising:

an account database maintained in computer readable media, the account database comprising a plurality of advertising accounts having funds associated therewith;

an advertiser database maintained in computer readable media, the advertiser database comprising an advertising unit identifier associated with an advertising unit, said advertising unit identifier further associated with one or more participating advertisers, and bid denominations and advertising content associated with each participating advertiser; and

a query processing section operatively coupled to the advertiser database and programmed to retrieve, responsive to a request for an advertising unit for display on a query client computer, a next advertiser and advertising content associated with the next advertiser in a rotation of participating advertisers associated with said advertising unit, based at least in part on the bid denominations of the participating advertisers.

- 15. (Original) The computer system recited in claim 14, wherein the query processing section is further programmed to, upon selection of the advertising unit by the query client computer, route the query client to an advertising content page associated with the next advertiser in the rotation of participating advertisers retrieved by the query processing section.
- 16. (Original) The computer system recited in claim 15, wherein the query processing section is further programmed to, debit the advertiser the bid denomination associated with the advertising unit.
- 17. (Original) The computer system recited in claim 15, wherein the advertising content associated with the advertiser comprises graphical content displayable on the query client computer as a graphical representation of the advertising unit.
- 18. (Original) The computer system recited in claim 15, wherein the advertising content associated with the advertiser comprises content associated with the website of the next advertiser.

19. (Original) A method for providing a pay for performance advertising system on a data network, the method comprising:

maintaining on a computer system having an account database maintained in computer readable media, the account database comprising a plurality of advertising accounts having funds associated therewith and an advertiser database maintained in computer readable media, the advertiser database comprising an advertising unit associated with one or more participating advertisers and bid denominations associated with the participating advertisers; receiving an advertising unit selection entered on a query client;

retrieving, responsive to said advertising unit selection, a next advertiser in a rotation of participating advertisers associated with said advertising unit, based on the bid denominations of the participating advertisers; and

routing the query client to an advertising content page associated with the next advertiser in the rotation of participating advertisers retrieved by the query processing section.

- 20. (Original) The method recited in claim 19, further comprising debiting the next advertiser retrieved in the step of retrieving based on the bid denomination in the advertising keyword database.
- 21. (Original) The method recited in claim 19, wherein the step of retrieving comprises determining the next advertiser in said rotation of participating advertisers based on historical rotation data of participating advertisers previously retrieved in the step of retrieving and the bid denomination of the participating advertisers.
- 22. (Original) The method recited in claim 19, wherein the step of retrieving comprises determining the next advertiser to reduce a disparity between historical rotation data of the participating advertisers and the bid denomination of the participating advertisers.
- 23. (Original) The method recited in claim 21, wherein the step of retrieving comprises determining historical rotation data comprising actual participation data of each of the participating advertisers.
- 24. (Original) The method recited in claim 21, wherein the step of retrieving comprises determining actual participation data based on a count of the number of times that each participating advertiser is retrieved in the step of retrieving.

- 25. (Original) The method recited in claim 21, wherein the step of retrieving comprises determining target participation data for each of the participating advertisers based on the respective bid denominations.
- 26. (Original) The method recited in claim 25, wherein the step of retrieving comprises determining the next advertiser in said rotation of participating advertisers by reducing the disparity between the actual participation data and the target participation data of each of the participating advertisers.
- 27. (Withdrawn) The method recited in claim 19, wherein the step of retrieving comprises determining the next advertiser based on a random number and the bid denomination of the participating advertisers.
- 28. (Withdrawn) The method recited in claim 27, wherein the method further comprises generating a random number scaled to the range of the sum of the bid denominations of the participating advertisers, and associating each participating advertiser with a subset of the range corresponding to the respective bid denomination of the respective participating advertiser.
- 29. (Withdrawn) The method recited in claim 28, wherein the step of retrieving comprises determining the next advertiser based on a correlation between the random number and the subset of the range corresponding to one of the participating advertisers.
- 30. (Original) The method recited in claim 19, wherein the method further comprises displaying, responsive to an advertising unit selection entered on a query client computer, a listing of a subset of participating advertisers associated with said advertising unit.
- 31. (Original) The method recited in claim 30, wherein the step of displaying further comprises displaying, responsive to an advertising unit selection entered on a query client computer, a listing of all participating advertisers associated with said advertising unit.
- 32. (Original) The method recited in claim 30, wherein the step of displaying further comprises displaying said listing in an order corresponding to the bid denominations associated with the participating advertisers.